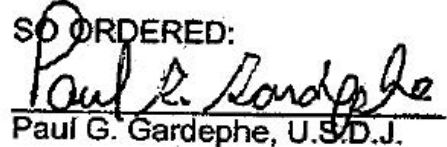




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**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**  
  
Paul G. Gardephe, U.S.D.J.

**Dated:** December 8, 2020

December 8, 2020

*Via ECF*

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Jose Maria et al., - 19 Cr. 868 (PGG)

Dear Judge Gardephe:

The undersigned represents Loren Rubio in the above captioned matter. I am writing to request that the Court temporarily alter the terms of Ms. Rubio's bail conditions so that she may travel to the Dominican Republic to assist in making arrangements for and attending her uncle's funeral.

On December 6, 2020, while riding a motorcycle, Ms. Rubio's uncle was the victim of a hit and run accident. Apparently, he suffered compound fractures of his legs and multiple fractures of his skull. In addition, as I understand it, doctors have informed the family that his heart is too weak to survive surgery and they are simply waiting for him to pass, which they anticipate happening this week. As such, although she understands that she just made a similar request in November for her grandmother's funeral, Ms. Rubio requests that the Court permit her to travel back to the Dominican Republic as soon as possible. She proposes to return to the New York no later than December 18, 2020.

Should the Court permit her to travel, Ms. Rubio will stay in the same place as her previous trip: [REDACTED] She will, of course, have her cellular telephone with her at all times. That number is [REDACTED].

We reiterate that Ms. Rubio is not a flight risk. Indeed, when the Court permitted her to travel to the Dominican Republic in November for her grandmother's funeral, Ms. Rubio returned on time. I have communicated with AUSAs Elizabeth Espinosa and Jun Xiang, as well

The Honorable Paul G. Gardephe  
December 8, 2020

as, Pre-Trial Services Officer Courtney DeFeo. Both institutions take no position on Ms. Rubio's request. Both, however, request that should the Court grant Ms. Rubio's application that it order Ms. Rubio to mail her passport back to pretrial within 24 hours of her return to the United States. Ms. Rubio consents to this reasonable request. Should Your Honor require anything further on this issue I am available at the Court's convenience to discuss the matter.

Respectfully submitted,

/s/

Gregory Morvillo

cc: AUSA Elizabeth Espinosa  
AUSA Jun Xiang  
Courtney DeFeo, Pre-Trial Services Officer